

EXHIBIT E

NEW YORK
LONDON
SINGAPORE
PHILADELPHIA
CHICAGO
WASHINGTON, DC
SAN FRANCISCO
SILICON VALLEY
SAN DIEGO
LOS ANGELES
TAIWAN
BOSTON
HOUSTON
AUSTIN
HANOI
HO CHI MINH CITY

DuaneMorris®

FIRM and AFFILIATE OFFICES

SETH A. GOLDBERG
DIRECT DIAL: +1 215 979 1175
PERSONAL FAX: +1 215 689 2198
E-MAIL: SAGoldberg@duanemorris.com

www.duanemorris.com

SHANGHAI
ATLANTA
BALTIMORE
WILMINGTON
MIAMI
BOCA RATON
PITTSBURGH
NEWARK
LAS VEGAS
CHERRY HILL
LAKE TAHOE
MYANMAR
OMAN
*A GCC REPRESENTATIVE OFFICE
OF DUANE MORRIS*

ALLIANCES IN MEXICO
AND SRI LANKA

December 2, 2019

VIA EMAIL TO VALPEC@KIRTLANDPACKARD.COM

Ruben Honik, Esq.
David Stanoch, Esq.
Golomb & Honik, P.C.

Daniel Nigh, Esq.
Levin Papantonio Thomas Mitchell
Rafferty & Proctor, P.A.

Adam Slater, Esq.
Mazie Slater Katz & Freeman, LLC

Conlee Whiteley, Esq.
Kanner & Whiteley, LLC

Re: ***In re Valsartan Products Liability Litigation***, Civ. No. 19-md-2875 (D.N.J.)
Facility and Testing Information

Counsel:

Pursuant to the Court's November 25, 2019 Order (Dkt. 303), Zhejiang Huahai Pharmaceutical Co., Ltd. ("ZHP") and Princeton Pharmaceutical Co. ("Princeton") provide the following information:

I. Identification of Facilities

As disclosed in a letter to Plaintiffs dated September 16, 2019, ZHP manufactures valsartan API at its Chuannan facility, located at Coastal Industrial Zone, Duqiao, Linhai, Zhejiang, 317016, China; and valsartan finished dose products at its Xunqiao facility located at Linhai, Zhejiang, 317024, China. ZHP began manufacturing valsartan API at the Chuannan facility in 2007, and began manufacturing valsartan finished dose at the Xunqiao facility in 2015.

II. Identification of Testing

The types of testing performed during the valsartan API and finished dose manufacturing processes are identified in Princeton's ANDAs and ZHP's DMF in the documents that begin with the following Bates numbers:

Duane Morris

December 2, 2019
Page 2

ANDA 204821:

PRINSTON00020754, PRINSTON00020496, PRINSTON00020500, PRINSTON00020504,
PRINSTON00020717, PRINSTON00020722, PRINSTON00020726, PRINSTON00020730,
PRINSTON00022317, PRINSTON00033450.

ANDA 206083:

PRINSTON00039378, PRINSTON00079310, PRINSTON00079329, PRINSTON00039337,
PRINSTON00039341, PRINSTON00039345, PRINSTON00039349, PRINSTON00039354,
PRINSTON00039359, PRINSTON00039362.

DMF 023491:

PRINSTON00009342, PRINSTON00017627, PRINSTON00018280, PRINSTON00009363,
PRINSTON00010648, PRINSTON00010903, PRINSTON00009782, PRINSTON00011393,
PRINSTON00018695, PRINSTON00010529.

DMF 020939:

PRINSTON00078435, PRINSTON00078548, PRINSTON00078700.

In providing this information, ZHP and Prinston expressly reserve all objections to discoverability and admissibility—including their objections to the scope of testing relevant to the issues in these actions—as well as all defenses, jurisdictional or otherwise.

Very truly yours,

/s/ Seth A. Goldberg

Seth A. Goldberg

cc: Jessica Priselac (jpriselac@duanemorris.com)
Lori G. Cohen (cohenl@gtlaw.com)
Clem C. Trischler (cct@pietragallo.com)
Jessica M. Heinz (Jheinz@c-wlaw.com)
Janet L. Poletto (jpoletto@hkmpp.com)
Alexia Brancato (alexia.brancato@kirkland.com)